

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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EDDYS N. GARCIA, as Administrator of the Goods, Chattels and Credits which were of
WENDY SANTOS, deceased, EDDYS N. GARCIA,
individually, EDDY I. GARCIA, an infant
by his father and natural guardian,
EDDYS N. GARCIA, and KENNY J. GARCIA, an
infant by his father and natural guardian,
EDDYS N. GARCIA,
Plaintiffs,
-against-
GINNETTI TRUCKING, LLC,
Defendant.
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**RESPONSE TO
COMBINED
DEMANDS**

Docket No.
07 CIV 4045

Judge Lynch

S I R S :

PLEASE TAKE NOTICE the following is plaintiffs' combined
response to demands of defendants:

REQUEST FOR PRODUCTION OF DOCUMENTS

1-2. Copies of all photographs in plaintiff's possession
has already been provided.

3. Authorization allowing your offices to obtain no-
fault file has already been provided.

4. Complete copy of police incident report has already
been provided.

5. Copies of all photographs in plaintiff's possession
has already been provided.

6. Authorization allowing your offices to obtain no-
fault file has already been provided.

7. Copies of all photographs in plaintiff's possession has already been provided.

DEMAND FOR EXPERT WITNESS INFORMATION

Expert witness information will be provided in accordance with the Court Rules.

REQUEST FOR PRODUCTION OF PARTY STATEMENTS

See police report, which was previously provided. Should additional information become available, we shall provide under separate cover.

NOTICE FOR DISCOVERY AND INSPECTION OF INCIDENT REPORT

Complete copy of police incident report has already been provided.

REQUEST FOR NAMES AND ADDRESSES OF WITNESSES

Angel Rivera, 586 Hartford Avenue, 2nd Floor, Providence, Rhode Island, 02909. Should additional information become available, we shall provide under separate cover.

REQUEST FOR COLLATERAL SOURCE INFORMATION

Authorization allowing your offices to obtain no-fault file has already been provided.

DEMAND FOR EMPLOYMENT RECORD AUTHORIZATIONS

Enclosed herewith, please find an authorization allowing your offices to obtain employment records for the decedent, Wendy Santos, employment records. Also, Eddys N. Garcia is not claiming loss of earnings as such, an authorization for his employment records is unnecessary.

DEMAND FOR PRODUCTION OF INSURANCE AGREEMENTS

1-3. Not applicable.

REQUEST FOR HOSPITAL and MEDICAL INFORMATION

Enclosed herewith please find the following authorizations:

Stamford Hospital (Eddys, Eddy and Kenny)
30 Shelburne Road
Stamford, CT 06902

Marcelo R. Olarte, M.D. (Eddys)
The Neurological Institute
Columbia University Medical Center
710 West 168th Street
New York, NY 10032-2603

Concourse Chiropractic (Eddys)
Dr. Mitchell Zeren
2676 Grand Concourse, Suite A
Bronx, NY 10458

Darien Emergency Medical Services (Eddys, Eddy and Kenny)
P.O. Box 2066
Darien, CT 06820

DEMAND FOR AUTHORIZATION FOR SOCIAL SECURITY PRINT-OUT and
DEMAND FOR INCOME TAX INFORMATION

Federal and State income tax returns together with authorization and proper identification will be provided under separate cover.

DEMAND FOR MARRIAGE CERTIFICATE

Enclosed please find copy of marriage certificate.

DEMAND FOR PRIOR INJURY INFORMATION

If applicable, will be provided under separate cover.

DEMAND FOR PRIOR PLEADINGS

Not applicable.

DEMAND FOR UNION RECORDS

Enclosed please find authorization allowing your office to obtain Union records for decedent, Wendy Santos, from Amalgamated Transit Union A.F.L.-C.I.O Local 1181-1061, 101-49 Woodhaven Blvd., Ozone Park, NY 11416.

NOTICE TO PRODUCE DEATH CERTIFICATE

Enclosed herewith please find a copy of death certificate, autopsy records, letters of administration. Also enclosed is an authorization allowing your offices to obtain the autopsy report.

NOTICE TO PRODUCE PHOTOGRAPHS, ACCIDENT REPORTS

1. Complete copy of police incident report has already been provided.

2. Copies of all photographs in plaintiff's possession has already been provided.

PLEASE BE ADVISED THAT plaintiff herein reserves the right to supplement this response.

Dated: New York, New York
June 29, 2007

Yours, etc.

GAIR, GAIR, CONASON,
STEIGMAN & MACKAUF

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Att: Harold J. Derschowitz, Esq.